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Attorney for MICHAEL BURCIAGA

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

**Plaintiff,**

V.

MICHAEL BURCIAGA,

Defendant.

Case No. 3:20-cr-00060-MMD-CLB

**STIPULATION TO CONTINUE  
MOTION DEADLINES**  
(First Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Rene L Valladares, Federal Public Defender, and CHRISTOPHER P. FREY, Assistant Federal Public Defender, counsel for MICHAEL BURCIAGA, Jason M. Frierson, United States Attorney, and PENELOPE BRADY, Assistant United States Attorney, counsel for the United States of America, that the deadline to file any and all pretrial motions and notices of defense be extended from April 11, 2023, to **April 18, 2023**.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including **May 2, 2023**, to file any and all responsive pleadings.

1 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they  
2 shall have to and **May 9, 2023**, to file any and all replies to dispositive motions.

3 This is the first stipulation to continue the motions deadlines. Counsel is requesting  
4 additional time to file pretrial motions mindful of the current trial date of June 8, 2023, at 9:00  
5 AM, the exercise of due diligence, in the interests of justice, and not for any purpose of delay.

6 DATED this 7<sup>th</sup> day April, 2023.  
7

8 RENE L. VALLADARES  
9 Federal Public Defender

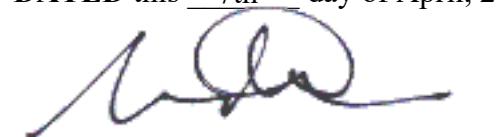
JASON M. FRIERSON  
United States Attorney

10 /s/ *Christopher P. Frey*  
11 By: \_\_\_\_\_  
12 CHRISTOPHER P. FREY  
13 Assistant Federal Public Defender  
Counsel for Joshua Michael Burciaga

10 /s/ *Penelope Brady*  
11 By: \_\_\_\_\_  
12 PENELOPE BRADY  
13 Assistant United States Attorney  
Counsel for United States

14  
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16 IT IS SO ORDERED.  
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18 DATED this 7th day of April, 2023.  
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20 MIRANDA M. DU  
21 CHIEF UNITED STATES DISTRICT JUDGE  
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